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18 UNITED STATES DISTRICT COURT

19 DISTRICT OF NEVADA

20 Cung Le, Nathan Quarry, Jon Fitch, Brandon
21 Vera, Luis Javier Vazquez, and Kyle
22 Kingsbury on behalf of themselves and all
others similarly situated,

23 Plaintiffs,

24 v.

25 Zuffa, LLC, d/b/a Ultimate Fighting
26 Championship and UFC,

27 Defendant.
28

Case No.: 2:15-cv-01045-RFB-(PAL)

**[PROPOSED] SECOND
STIPULATED DISCOVERY PLAN
AND SCHEDULING ORDER**

1 This is the second stipulation for an extension of time to complete expert discovery and to
2 file dispositive motions. On November 3, 2017, the Court entered a Stipulated Discovery Plan
3 and Scheduling Order (“Scheduling Order”) setting deadlines through dispositive motions that
4 adjusted the deadlines for dispositive motions. ECF No. 508. The prior Scheduling Order did not
5 extend any deadlines more than 30 days and extended deadlines after Rebuttal Expert Reports
6 only one week.

7 Beginning on December 13, 2017, the parties met and conferred to schedule the remaining
8 expert depositions. As a result of the this meet and confer process, the parties agreed that, due to
9 circumstances outside of the parties’ control and the addition of a third economic expert for
10 Plaintiffs who will principally respond to the report of Zuffa’s third economic expert, two
11 minimal adjustments to the Scheduling Order were required to accommodate the experts’
12 schedules. First, the parties propose that the last day to depose Plaintiffs’ rebuttal experts be
13 extended to February 8, 2018. The deposition of Plaintiffs’ third economic rebuttal expert is
14 scheduled to take place on that day. Second, as a result of the short time between the final
15 rebuttal expert deposition and the date Daubert and Class Certification motions are currently due,
16 the parties propose extending all deadlines after the final rebuttal expert deposition by only two
17 weeks with the exceptions of the summary judgment opposition and reply briefs. As those briefs
18 fall within the latter half of the summer and early fall, in light of the attorneys’ various planned
19 travel and vacation schedules, the parties request that both deadlines be extended by two weeks
20 each, and that the time for filing each subsequent summary judgment brief be extended by
21 approximately two weeks.

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The current deadlines are listed below for the Court's convenience. The parties have stipulated to the following proposed deadlines:

Case Event	Current Deadline	Proposed Deadline
Rebuttal Expert Reports	January 12, 2018	January 12, 2018
Last Day to Depose Plaintiffs' Rebuttal Experts	January 24, 2018	February 8, 2018
Daubert Motions	February 2, 2018	February 16, 2018
Class Certification Motion	February 2, 2018	February 16, 2018
Daubert Opposition Briefs	March 23, 2018	April 6, 2018
Class Certification Opposition Brief	March 23, 2018	April 6, 2018
Daubert Reply Briefs	April 23, 2018	May 7, 2018
Class Certification Reply Brief	May 15, 2018	May 30, 2018
Class Certification Hearing	Court's Convenience	Court's Convenience
Summary Judgment Motions	July 16, 2018	July 30, 2018
Summary Judgment Opposition Briefs	August 15, 2018	September 14, 2018
Summary Judgment Reply Briefs	September 14, 2018	October 26, 2018

IT IS SO ORDERED

THE HONORABLE PEGGY A. LEEN
UNITED STATES MAGISTRATE JUDGE

DATED: _____

Dated: January 5, 2018_

Dated: January 5, 2018

BERGER & MONTAGUE, P.C.

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By: /s/ Eric L. Cramer

By: /s/ Stacey K. Grigsby

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ATTESTATION OF FILER

The signatories to this document are myself and Eric Cramer, and I have obtained Mr. Cramer's concurrence to file this document on his behalf.

Dated: January 5, 2018

/s/ Stacey K. Grigsby

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **[Proposed] Second Stipulated Discovery Plan and Scheduling Order** was served on January 5, 2018 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Stacey K. Grigsby

Stacey K. Grigsby